

IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION
06 JAN 13 AM 11:33

William D. Reynolds, Col. USAF Ret.

Plaintiff,

vs

Windell Crawford, et al.,

Defendants

Case No. C-1-01-877, removed from
Common Pleas Court, Brown County,
Ohio Case No. 20010713 by counsel
John E. Vincent.

MOTION, by Plaintiff, for Defense
Counsel(s) to Cease and Desist their
Absurd filings received 12/12/2005
and for the Court to correct its
ORDER, Page 2 last paragraph, submit
its Corrected ORDER.

Now comes the Plaintiff who complains that DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION has been designed by
counsel Vincent and Landes to further delay TRIAL in the captioned case
wherein COUNSELORS Vincent and Landes have TESTIFIED in EXHIBIT F and therein
Page(s) 11 last para., Page 12 para. 1, Page 13, 2, and its content, Para. 1 for
what allegedly occurred on 10/11/2000.

The Court has yet to hear Plaintiff's Tape Recordings for the date of
10/11/2000, WITHOUT COUNSEL PRESENCE, as they have chosen not to hear same as
part of DISCOVERY offered by Plaintiff, several years ago.

a. From the content of Plaintiff's tape recordings, the Court will then see
that BOTH Affidavits by Chris Snider dated NOV 15, 2002 and therein Page 1 #3,
Larry Meyer dated NOV 6, 2002 and therein Page 1 ALSO #3, BOTH TWO (2) YEARS
AFTER THE FACT, are nearly IDENTICAL IN CONTENT, BOTH read:

b. On or about October 11, 2000, at approximately 4:30am, I was dispatched to
7013 State Route 221, Georgetown, Ohio for complaints of barking dogs.

1. Plaintiff was the COMPLAINTANT, therefore, it is Absurd to think he
would be complaining about his own dog barking, especially, since:

EXHIBIT D and therein EXHIBIT 2 is self-evident that it WAS NOT Plaintiff's dog that was barking and the fact it was he was the COMPLAINTANT in EACH of the three (3) calls he made on 10/11/2000 and the address/ violation being made under ORC CHAPTER 3767, however, :

1. The Commissioners FAILED to instruct the various dog wardens what laws were to be enforced under ORC Section 955.08, 955.11, 955.12, 955.21, 955.22, 955.221 and:

2. The various dog wardens for the past 20 years plus that Plaintiff has lived in Brown County, Ohio have each FAILED to enforce ORC Section 955.23, simply because they never read it, and or did not Comprehend the content.

3. When the truth comes out, and as evidenced in EXHIBIT D and therein EXHIBIT 5, the Brown County, Ohio Sheriff's Department "DOES NOT DO DOGS" in violation of the OATH EACH HAS TAKEN, to uphold the U.S. Constitution, Ohio Constitution and the Laws for the State of Ohio, at a minimum, in violation of U.S. Constitution, Amendment XIV Section 1, in part, Quoted: nor deny to any person within its jurisdiction the equal protection of the laws.

DEFENDANT'S MEMORANDUM IN OPPOSITION TO PLAINTIFF'S

MOTION FOR RECONSIDERATION

1) Plaintiff's Motion is untimely; Response: NOT SO, neither Plaintiff or counsel Vincent/Landes have ever received A MODIFICATION OF SAID ORDER from Judge Herman J. Weber, therefore, NO TIME HAS TOLLED as counsel(s) in their LAW AND ARGUMENT, II., Page 2, wants this Court to think/believe.

B. Page 2 reads in-part, Quoted: When a party files an untimely motion for reconsideration, etc, etc.: As proven in 1) above, without A MODIFICATION OF SAID ORDER by Judge Herman J. Weber NO TIME HAS TOLLED, therefore, Plaintiff's MOTION FOR RECONSIDERATION, is/was TIMELY.

Counsel Vincent/Landes content of Page 3 is an excellent RECITATION of the law, however Plaintiff takes exception to their para. 2 line 3 in-part, Quoted:

(without any supportive evidence), is more of their Blowing since:

MOTION by Plaintiff for the Court to reconsider its ORDER of 10/4/2005, file-stamped NOV 30 2005 as shown below:

1. The Court must understand that Magistrate Jack Sherman Jr. FAILED to Comprehend the content if Plaintiff's Law Suit, or was BIASED TOWARD counsel Vincent/Landes and evidenced as such in his PERSONAL REPORT AND RECOMMENDATION wherein he FAILED to note that counsel Vincent/Landes TESTIFIED in EXHIBIT F, filed with this Court on or about NOV 25, 2002 wherein their EXHIBIT B does not correlate with PLAINTIFF'S EXHIBIT A, a Certified Copy from the Brown County, Ohio Court, CERTIFIED on 11/25/2002.

2. M.J. Jack Sherman FAILED to Read, Comprehend or Adjudicate the content of EXHIBIT F and therein Pages 11 last para. 12 1st para., 13 1st Para. and the TESTIMONY THEREIN by counsel Vincent/Landes, therefore, his Prejudicial Bias toward Plaintiff.

3. Counsel Vincent/Landes in DISCOVERY have FAILED to NAME the NEIGHBOR who allegedly brought Plaintiff's Medications to the Brown County, Ohio JAIL on 10/11/2000, therefore, leaving Plaintiff without any alternative but to SUPOENA all thirty (30) neighbors that live on State Route 221 to see if they BREACHED Plaintiff's security at the JAIL by getting his keys from Deputy, Cpl. Carl Smith on 10/11/2000, by going into Plaintiff's home without permission [t]hus Breaking and Entering.

4. M.J. Jack Sherman Jr. FAILED to note as did Judge Margaret A. Clark that Deputy Clark Gray was not a Witness to EXHIBIT F and therein EXHIBIT B, Case No. CRB0001246 on 2000 OCT 11 AM9:13 or EXHIBIT B, therefore, irrefutable that

Due Process has never occurred for Plaintiff in violation of U.S. Constitution, Amendment(s) I, IV, V, VII, VIII, XIV Section 1, from 10/11/2000 to this file-stamp date.

5. Plaintiff shall once again bring his Tape Recordings to the Court on 1/18/2006 WITHOUT the presence of counsel Vincent/Landes or their law office to listen to the content because Judge Herman J. Weber cannot hear the emphasis for what Plaintiff has written and counsel Vincent/Landes REFUSED to listen to those tapes as offered to them in Discovery.

6. The balance of Pages 2,3 is nothing more than Vincent/Landes NONSENSICAL BLABBING that is meaningless to this Court and Plaintiff, alike. Lastly, and Quoted from, DEFENDANT'S MEMORANDUM IN OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION.,

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B. Page 2 reads in-part, Quoted: When a party files an untimely motion for reconsideration, etc. etc.: As proven in 1) above, without A MODIFICATION OF SAID ORDER by Judge Herman J. Weber NO TIME IS TOLLED, therefore, Plaintiff's MOTION FOR RECONSIDERATION, is/was TIMELY.

FURTHER, PLAINTIFF SAYETH NAUGHT.


Col. William D. Reynolds, Plaintiff
(937) 378-4331

CERTIFICATION

Two original signed copies mailed to the Clerk's office for file-stamp and return of one copy to Plaintiff in the S.A.S.E. provided. Copy mailed to counsel Vincent/Landes at their business address in Col's Ohio on 1/10/2006, all by regular U.S. Mail.

(4.)